

### **REMARKS**

In the Official Action mailed **January 10, 2005**, the Examiner reviewed claims 1-18. Claims 1-18 were rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the enablement requirement. Claims 1-18 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 1-12, and 14-18 were rejected under 35 U.S.C. §102(b) as being anticipated by Kevner (USPN 5,956,509, hereinafter “Kevner”). Claims 1, 3-12 and 14-18 were rejected under 35 U.S.C. §102(b) as being anticipated by Colyer (USPN 5,903,725, hereinafter “Colyer”). Claim 13 was rejected under 35 U.S.C. §103(a) as being unpatentable over Kevner in view of Munakata (USPN 5,717,917, hereinafter “Munakata”).

#### **Rejections under 35 U.S.C. §112, first paragraph**

Claims 1-18 were rejected as failing to comply with the enablement requirement. Examiner cites paragraph [0010] of USPub 2003/0041069 (the instant application) as not including “...a clear and concise written description of the manner of making bi-directional relationships between objects in an object model of a relational database...”

Applicant respectfully directs the Examiner’s attention to paragraph [0058] of the instant application where it is made clear that the mapping is between an object application 520 including object model 525 and a relational database (an implementation of data storage 530) (see Figure 6 of the instant application).

#### **Rejections under 35 U.S.C. §112, second paragraph**

Claims 1-18 were rejected as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Applicant has amended independent claim 1 to clarify the relationships among the peer objects, the peer values, and the proxy objects. These amendments find support in paragraphs [0047]-[0056] of the instant application. no new matter has been added.

**Rejections under 35 U.S.C. §102(b) and 35 U.S.C. §103(a)**

Independent claim 1 was rejected as being anticipated by Kevner and/or Colyer. Applicant respectfully points out that Kevner teaches a remote request system for the **execution of remote requests** on an on-line service (see Kevner, Abstract). Additionally, Colyer teaches **protecting a server** against invalid usage of proxy objects (see Colyer, Abstract).

In contrast, the present invention uses proxy objects to allow an object-oriented model to be used to maintain and **update bi-directional relationships in a relational database** (see paragraph [0058] of the instant application). Using proxy objects in this manner provides the advantages of using an object-oriented technique to access data in a relational database. Without using the proxy objects, there is no way to maintain and update bi-directional relationships in the relational database. There is nothing within Kevner or Colyer, either explicit or implicit, which suggests using proxy objects to allow an object-oriented model to be used to maintain and update bi-directional relationships in a relational database.

The above cited amendments to independent claim 1 clarify that the present invention uses proxy objects to allow an object-oriented model to be used to maintain and update bi-directional relationships in a relational database. These amendments find support in FIG. 4 and 4A, and in paragraphs [0045]-[0058] of the instant application.

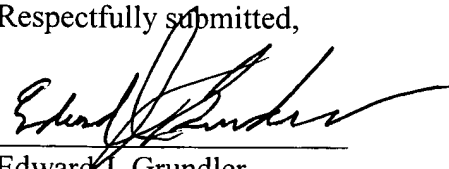
Hence, Applicant respectfully submits that independent claim 1 as presently amended is in condition for allowance. Applicant also submits that claims 2-18, which depend upon claim 1, are for the same reasons in condition for allowance and for reasons of the unique combinations recited in such claims.

**CONCLUSION**

It is submitted that the present application is presently in form for allowance. Such action is respectfully requested.

Respectfully submitted,

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